

**CIVIL COVER SHEET**

The JS-44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM).

**I. (a) PLAINTIFFS****UNITED STATES OF AMERICA**

(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF \_\_\_\_\_  
(EXCEPT IN U.S. PLAINTIFF CASES)

**DEFENDANTS****AMA CONSTRUCTION LLC**

COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT \_\_\_\_\_

Burlington

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

(c) ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER)  
Jordan M. Anger, AUSA  
United States Attorney's Office  
970 Broad St., Room 700  
Newark, New Jersey 07102  
(973)645-2829

ATTORNEYS (IF KNOWN)

**II. BASIS OF JURISDICTION** (PLACE "X" IN ONE BOX ONLY)

<input checked="" type="checkbox"/> 1 U.S. Government Plaintiff	<input type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)
<input type="checkbox"/> 2 U.S. Government Defendant	<input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (PLACE AN "X" IN ONE BOX FOR DIVERSITY CASES ONLY)

Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1 Incorporated or Principal Place	<input type="checkbox"/> 4	<input type="checkbox"/> 4 PTF
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2 Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5 PFT
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3 Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6 DEF

**IV. CAUSE OF ACTION**

(CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE BRIEF STATEMENT OF CAUSE. DO NOT CITE JURISDICTIONAL STATUTES UNLESS DIVERSITY.)

28 U.S.C. § 1345 - United States as Plaintiff

**V. NATURE OF SUIT**

(PLACE AN "X" IN ONE BOX ONLY)

CONTRACT	TORTS	FORFEITURE/ PENALTY	BANKRUPTCY	OTHER STATUSES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input checked="" type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment at Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input checked="" type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	<b>PERSONAL INJURY</b> <input type="checkbox"/> 362 Personal Injury Med. Malpractice <input type="checkbox"/> 365 Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Prod. Liab.	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 U.S.C. 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 U.S.C. 158 <input type="checkbox"/> 423 Withdrawal 28 U.S.C. 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 290 All Other Real Property	<b>REAL PROPERTY</b> <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input checked="" type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 440 Other Civil Rights	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Other (including 1983 Actions)	<input type="checkbox"/> 861 HIA (1395ft) <input type="checkbox"/> 862 Black Lung(923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	<b>SOCIAL SECURITY</b> <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS - Third Party 26 U.S.C. 7609 <b>OTHER STATUSES</b> <input type="checkbox"/> 875 Customer Challenge 12 U.S.C. 3140 <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determin. Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes <input type="checkbox"/> 890 Other Statutory Actions

**VI. ORIGIN**  
 1 Original Proceeding 2 Removed from State Court 3 Remanded from Appellate Court 4 Reinstated or Reopened 5 Transferred from another district (specify) 6 Multidistrict Litigation 7 Appeal to District Judge from Magistrate Judge**VII. REQUESTED IN COMPLAINT:**

CHECK IF THIS IS A CLASS ACTION

 UNDER F.R.C.P. 23**DEMAND \$**

CHECK YES only if demanded in complaint:

**JURY DEMAND:**  YES  NO**VII. RELATED CASE(S)** (See instructions):  
**IF ANY**

DATE

SIGNATURE OF ATTORNEY OF RECORD

Jordan M. Anger, Assistant United States Attorney

CRAIG CARPENITO  
United States Attorney  
JORDAN M. ANGER  
Assistant U.S. Attorney  
970 Broad Street, Room 700  
Newark, NJ 07102  
Tel. 973-645-2829  
Fax. 973-645-3210  
Email: [jordan.anger@usdoj.gov](mailto:jordan.anger@usdoj.gov)

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA, : **HON.**  
Plaintiff, : Civil Action No.  
v. : **COMPLAINT**  
AMA CONSTRUCTION LLC :  
Defendant. :

CRAIG CARPENITO, United States Attorney for the District of New Jersey, on behalf of plaintiff, United States of America, for its Complaint against defendant, AMA Construction LLC, says that:

1. This is a civil action brought on behalf of the United States of America and this Court has jurisdiction under the provisions of 28 U.S.C. Section 1345.
2. The defendant resides in Cinnaminson, within the state and district of New Jersey.

3. Defendant owes plaintiff the principal sum of \$63,360.00, as more fully set forth on the Certificates of Indebtedness attached hereto as Exhibit "A and B".

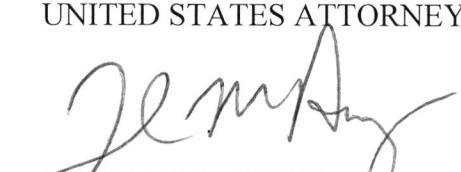
4. Due demand has been made for payment.

THEREFORE, plaintiff demands judgment against defendant as follows:

In the amount of \$108,152.59 (\$63,360.00 principal, \$2,341.79 interest accrued through October 17, 2018, \$13,733.97 penalties, \$40.00 administrative fees, \$25,432.25 DMS fees, and \$3,244.58 DOJ fees);

- b. Interest to accrue at the rate of 1.000% per annum from October 17, 2018 to date of judgment;
- c. Interest from the date of judgment at the legal rate in effect on the date of judgment until paid in full;
- d. Costs of suit; and
- e. For such other relief as this Court may deem just.

CRAIG CARPENITO  
UNITED STATES ATTORNEY

  
By: JORDAN M. ANGER  
ASSISTANT U.S. ATTORNEY



U.S. DEPARTMENT OF THE TREASURY  
BUREAU OF THE FISCAL SERVICE  
WASHINGTON, D.C. 20227

ACTING ON BEHALF OF  
U.S. Department of Labor, Occupational Safety & Health Administration  
CERTIFICATE OF INDEBTEDNESS

Debtor Name(s) and Address(es):

AMA Construction LLC  
141 Route 130 South, Box 337  
Cinnaminson, NJ 08077

RE: Treasury Claim TRFM1500277843

I certify that the U.S. Department of Labor, Occupational Safety & Health Administration (OSHA) records show that the debtor named above is indebted to the United States in the amount stated as follows:

Principal:	\$ 57,200.00
Interest through 10/17/18*:	\$ 2,113.00
Penalty fee through 10/17/18*:	\$ 12,392.02
Admin fee:	\$ 20.00
DMS fees:	\$ 22,952.01
DOJ fees:	\$ 2,928.16

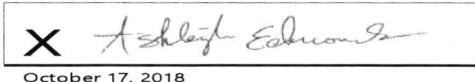
(pursuant to 31 U.S.C. 3717(e) and 3711(g)(6), (7); 31 C.F.R. 285.12(j) and 31 C.F.R. 901.1(f); and 28 U.S.C. 527, note)

**TOTAL debt owed as of 10/17/18: \$ 97,605.19**

\*NOTE: Per the creditor agency, once the debt is referred to Fiscal Service, interest continues to accrue at the rate of 1% per annum as well as a penalty at the rate of 6% per annum.

This debt reportedly arose in connection with the numerous workplace safety violations of the Occupational Safety and Health Act of 1970 (29 U.S.C. 650/651 et seq.) and OSHA regulations (29 C.F.R. 1926), as noted during the May 2014 OSHA inspections of the debtor's work site at S 19th & Lombard St, Philadelphia, PA 19146.

**CERTIFICATION:** Pursuant to 28 USC ss. 1746, I certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief based upon information provided by the U.S. Department of Labor, Occupational Safety & Health Administration.

  
October 17, 2018

Signed by: Ashleigh N. Edmonds

Ashleigh Edmonds  
Financial Program Specialist  
U.S. Department of the Treasury  
Bureau of the Fiscal Service



U.S. DEPARTMENT OF THE TREASURY  
BUREAU OF THE FISCAL SERVICE  
WASHINGTON, D.C. 20227

ACTING ON BEHALF OF  
U.S. Department of Labor, Occupational Safety & Health Administration  
CERTIFICATE OF INDEBTEDNESS

Debtor Name(s) and Address(es):

AMA Construction LLC  
141 Route 130 South, Box 337  
Cinnaminson, NJ 08077

RE: Treasury Claim TRFM1701181370

I certify that the U.S. Department of Labor, Occupational Safety & Health Administration (OSHA) records show that the debtor named above is indebted to the United States in the amount stated as follows:

Principal:	\$ 6,160.00
Interest through 10/17/18*:	\$ 228.79
Penalty fee through 10/17/18*:	\$ 1,341.95
Admin fee:	\$ 20.00
DMS fees:	\$ 2,480.24
DOJ fees:	\$ 316.42

(pursuant to 31 U.S.C. 3717(e) and 3711(g)(6), (7); 31 C.F.R. 285.12(j) and 31 C.F.R. 901.1(f); and 28 U.S.C. 527, note)

**TOTAL debt owed as of 10/17/18: \$ 10,547.40**

\*NOTE: Per the creditor agency, once the debt is referred to Fiscal Service, interest continues to accrue at the rate of 1% per annum as well as a penalty at the rate of 6% per annum.

This debt reportedly arose in connection with the numerous workplace safety violations of the Occupational Safety and Health Act of 1970 (29 U.S.C. 650/651 et seq.) and OSHA regulations (29 C.F.R. 1926), as noted during the September 2014 OSHA inspections of the debtor's work site at 200 South Avenue, Building C-4, South Plainfield, NJ 07080.

**CERTIFICATION:** Pursuant to 28 USC ss. 1746, I certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief based upon information provided by the U.S. Department of Labor, Occupational Safety & Health Administration.


Ashleigh Edmonds

October 17, 2018

Signed by: Ashleigh N. Edmonds

Ashleigh Edmonds  
Financial Program Specialist  
U.S. Department of the Treasury  
Bureau of the Fiscal Service

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28 U.S.C. § 1345 - United States as Plaintiff

**V. NATURE OF SUIT** (PLACE AN "X" IN ONE BOX ONLY)

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				<b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS - Third Party 26 U.S.C. 7609

<b>VI. ORIGIN</b>	<input type="checkbox"/> 2 Removed from State Court	<input type="checkbox"/> 3 Remanded from Appellate Court	<input type="checkbox"/> 4 Reinstated or Reopened	<input type="checkbox"/> 5 Transferred from another district (specify)	<input type="checkbox"/> 6 Multidistrict Litigation	<input type="checkbox"/> 7 Appeal to District Judge from Magistrate Judgment
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<b>VII. REQUESTED IN COMPLAINT:</b>	CHECK IF THIS IS A CLASS ACTION <input type="checkbox"/> UNDER F.R.C.P. 23	<b>DEMAND \$</b>	CHECK YES only if demanded in complaint: <b>JURY DEMAND:</b> <input type="checkbox"/> YES <input type="checkbox"/> NO			
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**VII. RELATED CASE(S)** (See instructions):  
**IF ANY**

DATE

SIGNATURE OF ATTORNEY OF RECORD

Jordan M. Anger, Assistant United States Attorney